

# EXHIBIT D

## Second Mailer, dated March 24, 2021

## SPARACINO

PLLC

1920 L Street, NW, Suite 535  
Washington, D.C. 20036

### ADVERTISEMENT

March 24, 2021

**VIA FEDEX**

[Mr./Mrs./Ms.] [First Name] [Last Name]

[Address]

**RE: Potential Antitrust Claims Against UFC**

Dear [Mr./Mrs./Ms.] [Last name],

If you have already retained a lawyer for this matter, please disregard this letter. We write to follow up with you regarding the letter and informational material we previously sent you regarding your potential claims against UFC. We also write to update you on the class action lawsuit *Le v. Zuffa*, No. 2:15-cv-01045-RFB-BNW, pending in the U.S. District Court for the District of Nevada (the “Class Action”).

In *Le v. Zuffa*, the Court appointed the law firms Berger & Montague, P.C., Cohen Milstein Sellers & Toll PLLC, and Joseph Saveri Law Firm, Inc, as “Interim Co-Lead Class Counsel” and Wolf Rifkin, Shapiro, Schulman & Rabkin, LLP as “Liaison Counsel” to represent the interests of class. These firms have been working on the *Le v. Zuffa* case since before it was filed in 2014. To be clear, we are not class counsel nor have we appeared as counsel in *Le v. Zuffa*.

On or about December 10, 2020, the Court indicated its intention to certify a class defined as follows: all persons who competed in one or more live professional UFC-promoted MMA bouts taking place or broadcast in the United States from December 16, 2010 to June 30, 2017 (the “Bout Class”). If you are a member of the Bout Class, then your interests are currently represented by Interim Class Counsel and Liaison Counsel. You do not need take any action as this time to benefit from any recovery in the Class Action. In the future, you should receive a Court-approved notice that explains your rights as a member of the Bout Class, including the right to opt-out of the Class Action, which you should carefully review.

We believe you should consider opting out of the *Le v. Zuffa* class action and would be happy to explain to you the benefits of pursuing your own litigation so you can decide which choice is best for you and your family. If you do decide to opt out, then you would not be eligible to participate in any potential recovery in the Class Action. You would chart your own course. If, however, you wish to remain part of the Bout Class, you need not do anything in response to this letter or our prior letter.

**We will never ask you to break any agreement you have with UFC, and we will never discourage you from fighting in any UFC event, working for any UFC entity, or otherwise participating in any venture with UFC or anyone associated**

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**with UFC. We have reached out to you only because we think you may have a substantial legal claim relating to your time as an MMA fighter, and we would be happy to represent you as your lawyer if you agree, we determine your claim has merit, and you agree to our normal engagement letter. Regardless of your decision, however, Sparacino PLLC and Scott+Scott are not in any way encouraging you to change any contractual, employment, or other legal relationship you currently have, or may have, with UFC or anyone associated with UFC. If you already have legal counsel with respect to your potential antitrust claims, please ignore this letter.**

Unless you reach out to us, this will be the last time my firm ever contacts you.

I am free to talk to you anytime. We would be honored to represent you if your claim is viable and you choose to sue UFC. It would be an honor to fight in the legal arena on your behalf. Please call at your convenience (202-629-9740) or email ([ryan.sparacino@sparacinopllc.com](mailto:ryan.sparacino@sparacinopllc.com)) to arrange a time to talk, including nights or weekends.

Yours truly,



Ryan R. Sparacino, Managing Partner  
Licensed to practice law in Washington, DC only (Inactive in Virginia)

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Stacy J. Taylor is actively licensed in Washington, D.C. and is the lawyer who is responsible for Sparacino PLLC's advertisements. Sparacino PLLC's address is 1920 L Street, N.W., Suite 535, Washington, D.C. 20036, and the firm's phone numbers are: (202) 629-3530 and (202) 629-9740.

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